

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

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DOREL STEEL ERECTION CORPORATION :

vs. :

CAPCO STEEL CORPORATION :

and :

CANAM STEEL CORPORATION :

Reach and Apply Defendant :

U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
C.A. No.: 05-10627-WGY

CAPCO STEEL CORPORATION'S INITIAL DISCLOSURES

Pursuant to Rule 26(a) of the Federal Rules of Civil Procedure, and without waiving any claim of privilege, work-product protection, or other basis for non-disclosure, defendant, Capco Steel Corporation, makes the following initial disclosures:

A. Rule 26(a)(1)(A) Witness Disclosures

Unless otherwise indicated, the following witnesses are officer or employees of Capco and should be contacted through the undersigned counsel.

1. Michael Caparco

Mr. Caparco has knowledge of the negotiation, execution and performance of Capco's memorandum of understanding with plaintiff in relation to the Boston Convention and Exhibition Center project (the "Project"). Mr. Caparco also has knowledge of the negotiation, execution and performance of Capco's subcontract with defendant, Canam Steel Corporation.

2. Christopher Carey

Mr. Carey has knowledge concerning the project known as the Boston Convention Center and was project manager in relation to said project.

B. Rule 26(a)(1)(B) Document Disclosure

Documents in Capco's possession, custody and control that it may use to support its defenses include:

1. Memorandum of Understanding dated July 19, 2001

Documents in relation to an accounting of the project in relation to the Memorandum of Understanding are in the possession of Capco. Financial disclosures and accountings have been given to plaintiff, Dorel. Any back up, etc. in relation to all financial transactions in relation to the Memorandum of Understanding are in the possession, custody or control of Capco at its offices located at 33 Acorn Street, Providence, Rhode Island 02903

C. Rule 26(a)(1)(C) Damages Disclosure

Not applicable.

D. Rule 26(a)(1)(D) Insurance Disclosure

Not applicable.

Defendant,
CAPCO STEEL CORPORATION
By their Attorneys,



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CERTIFICATION

I, the undersigned, hereby certify that on the 24th day of May, 2005, I mailed a true copy of the within document by regular, first-class mail, postage prepaid, to the following:

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